

**HOLLOW EARTH RADIO**

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August 15, 2011

Ms. Marlene H. Dortch

Secretary

**Federal Communications Commission 445 12th Street,
SW Washington, D.C. 20554**

Re:MM Docket No. 99-25 (LPFM Proceeding)

Dear Ms. Dortch:

It has come to our attention the FCC is currently deciding the fate of LPFM channel availability. I am the co-founder of Hollow Earth Radio, a 501(c)3 community radio station, which has been operating online for the past five years with an all-volunteer staff of nearly eighty people. Our primary mission and focus is to provide a forum for underrepresented sounds and perspectives, particularly those of the Pacific Northwest. We have become an established organization in Seattle, securing 11 substantial grants from Humanities of Washington & 4Culture. We have received acclaim from local media like the Seattle Times, the Stranger and the Seattle Weekly who awarded us **Best Independent Radio**. In an effort to further our goal of connecting community voices, stories and music - and to truly become the best *radio station* in Seattle - we would love the opportunity to expand beyond web-based streaming and on to terrestrial airwaves.

We have been looking to license an LPFM radio station for several years in order to broadcast local artists and eclectic music that currently does not receive airplay in Seattle. Additionally, we would like to license an LPFM to provide Seattle residents access to the local airwaves. Public access to local media has been dwindling in Seattle in the last few years and Hollow Earth Radio believes that there are several areas where local programming is lacking. We are very proud of our online programming, with highlights that include: a show broadcast entirely in Spanish, a hyperlocal show focused on our current location in Seattle's historic Central District, a show focusing on immigrant communities in the Seattle area, and a large-scale documentary series on the historical legacy of independent music in the Pacific Northwest (for which we received an \$8,000 grant to produce). In general, we share a wide-range of challenging & exciting Pacific NW music too experimental or cheaply produced to find its way on any other local radio outlet.

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We are deeply worried about the fate of LPFM in Seattle, and found it troubling to count **twenty one translators already licensed in the Seattle-Tacoma area** (see attached at end of letter). One broadcaster owns **seven** area translators. We counted **one LPFM** already licensed (not in Seattle or Tacoma, but in the small town of Fall City, WA) in the Seattle metro. **That LPFM is currently encroached upon by a commercial broadcaster.**

We do not understand why the FCC would want to license so many translators in Seattle, yet leave so little room for all the Seattle nonprofits wanting to create local LPFM stations for arts, cultural, and educational use.

It's important that access to the airwaves in metropolitan areas are as accessible as rural areas. For instance, we previously asked a Seattle-area translator owner whether they would sell their translator. They asked \$200,000 for a translator that did not even serve Seattle directly. They are currently leasing the translator to another broadcaster. It is unfortunate that some translator owners applied in 2003 as a means of making a large amount of money off the opportunity. This leaves only the wealthiest of broadcasters that can then afford to utilize these channels.

We believe that it is in the public interest for the FCC to open an LPFM filing opportunity before granting translators to use of the last remaining channels in Seattle. There is already an ample amount of translators licensed in Seattle, mainly rebroadcasting redundant area programming, or religious network programming from other states. We are urging you to choose a proposal that preserves channels for LPFM in urban areas like Seattle, so that the citizens of Seattle can hear its own voices on the airwaves.

Yours truly,
Garrett Kelly
Technical Director
Hollow Earth Radio

Twenty One Seattle-Tacoma area translators: K201EN Everett WA, K201AB West Seattle, K201EX Greenwater, K205DF Enumclaw, K206CJ Issaquah, K206DL Granite Falls/Everet, K206DM Bremerton, K207AP Sumner & Lake Tapps, K207AZ Gig Harbor, K220HD Fall City, K221FJ Tacoma, K225AX White Center, K229BL Gig Harbor, K229BP Orting, K233BU White Center, K258BJ Everett, K277AE Seattle, K281AS Tacoma, K285FJ Brinnon, K289AK Orting, K293AY Enumclaw